

September 22, 2021

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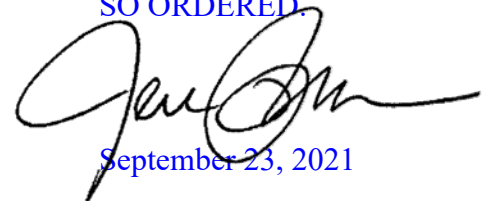
VIA ECF

Hon. Jesse Furman
United States District Court
40 Foley Square, Room 1105
New York, New York 10007

Re: Cabral v. Dollar Tree, Inc.
SDNY 20-cv-9906 (JMF)

Application GRANTED in part. The deadline for the parties to submit the Joint Pretrial Order and other required pretrial filings is hereby extended to **November 1, 2021**. Further requests for extensions are unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 28.

SO ORDERED.



September 23, 2021

Dear Judge Furman:

We represent Defendant Dollar Tree Stores, Inc. sued herein as Dollar Tree, Inc. (“Dollar Tree”). Jay Campbell represents Plaintiff. We submit the following joint letter motion to request a 45 day extension of time—until November 15, 2021—for the parties to submit the Joint Pre-Trial Order and Required Pretrial Filings. The Joint Pretrial Order is currently due on September 30, 2021. Your Honor granted two prior extensions: the parties jointly requested an extension on April 21, 2021, and Plaintiff requested an extension of time to complete expert discovery on July 31, 2021. Discovery is complete and there are no other existing deadlines or appearances scheduled before the Court.

The parties request the extension as we are working diligently to resolve the matter. As reflected in our September 9, 2021 letter to Judge Freeman (Dkt. No. 27), we have made significant strides towards settlement. We request an additional 45 days as we work to bring those efforts to fruition.

If you have any questions or wish to discuss this matter more fully, please feel free to contact us.

Respectfully submitted,

s/ Jay Campbell

Jay Campbell, Esq.
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s/ Gary N. Smith

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